

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

CHARITY CHIDINMA  
EMERONYE SWIFT,

Plaintiff,

V.

FRONTIER AIRLINES, INC., et. al.

Defendants.

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) Case No: **1:14-CV-001139**

**MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

Geoffrey S. Burke and Douglas M. Coleman (collectively “Movants”)

respectfully move to withdraw as counsel of record herein on behalf of Plaintiff Charity Chidinma Emeronye Swift and in support of their motion for leave to withdraw as counsel pursuant to Local Rules of Civil Procedure 7 and 83.1(G) state as follows:

Plaintiff is dissatisfied with present counsel and would prefer to represent herself or retain new counsel. Accordingly, the Movants provided reasonable notice to Plaintiff of their intent to request leave from this Court to withdraw as counsel.

Withdrawal is permitted under Rule 1.16(b) of the Virginia Rules of Professional Conduct. Further, it is clear the withdrawal can be accomplished without impeding the administration of justice, efficiency, or functions of this Court.

Movants respectfully request that the Court stay all proceedings to provide Plaintiff ten (10) days to retain new counsel which will, in turn, extend the deadline for Plaintiff to file the response to Defendant's Motion to Dismiss until December 5, 2014.

A proposed Order is submitted herewith and Movants waive a hearing on this matter.

WHEREFORE, Movants respectfully request that this Court grant their Motion and provide leave for Movants to withdraw as counsel in this litigation.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_  
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-and-

\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of November 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Sarah E. Moffett (VA Bar No. 72209  
LeClairRyan, a Professional Corporation  
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-and-

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**Attorneys for Frontier Airlines, Inc.**

I further certify that a copy of the foregoing motion was mailed on the 17<sup>th</sup> of November 2014 to:

Charity Swift  
2121 Eisenhower Avenue, Suite 200  
Alexandria, Virginia 22314-4688

\_\_\_\_\_/s/\_\_\_\_\_  
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